

Environmental Protection Agency 1701 First Avenue, Maywood, IL. 60153

(312) 345-9780

CERTIFIED MAIL

May 31, 1984

Mr. Donald Retsky, Vice President Hall Aluminum Company 1751 State Street Chicago Heights, Ill. 60411

EPA Region 5 Records Ctr.

COOK CO. - LPC 03104584 CHICAGOHTS. / MALL ALUMINUM

Re: Hall Aluminum Company (Cook County)

Dear Mr. Retsky:

On February 16, 1984 and May 16, 1984, Agency inspections of the process wastewater treatment system and the generation and treatment of hazardous waste at the subject facility revealed the following problems and/or deficiencies:

- 1. The use/operation of your wastewater treatment works without an Agency operating permit, as required by Section 12(b) of the Illinois Environmental Protection Act.
- 2. The discharge of contaminants from your wastewater treatment works to waters of the State of Illinois without a National Pollutant Discharge Elimination System (NPDES) Permit, as required by Section 12 of the Illinois Environmental Protection Act.
- The discharge of contaminants from your wastewater treatment works so as to cause water pollution in Illinois in violation of Section 12(a) of the Illinois Environmental Protection Act.
- 4. Failure to determine whether or not wastes generated by your facility are hazardous by utilizing the method described in 35 Illinois Administrative Code, Section 722.111 of the Resource Conservation and Recovery Act.

RECEIVED

JUN 18 1984

E.P.A. — D.L.P.C. STATE OF ILLINOIS

- 5. Failure to submit a "Notification of Hazardous Waste Activity" stating the location and general description of such activity and the identified or listed hazardous waste(s) handled by your facility, as per Section 3010 of the Resource Conservation and Recovery Act.
- 6. Failure to comply with the requirements of 35 Illinois Administrative Code 725 as a generator/treater of hazardous waste, including but not limited to:
 - a. Obtaining a waste analysis.
 - b. Preparing and maintaining a waste analysis plan.
 - c. Preparing and maintaining an inspection plan/schedule.
 - d. Preparing and maintaining personnel training records.
 - e. Preparing and maintaining an adequate Contingency Plan.
 - f. Preparing and maintaining facility operating records.
 - g. Submitting an Annual Report.
 - h. Preparing and maintaining an adequate Closure Plan.
 - i. Obtaining adequate financial assurance and submitting proof of such.

It is the Agency's desire to offer you assistance in developing a suitable program to correct the above-outlined problems and/or deficiencies. Toward this end, we request your attendance at a Compliance Conference to be held:

DATE: June 19, 1984

TIME: 10:00 A.M.

PLACE: Illinois Environmental Protection Agency

1701 South First Avenue - Suite 600

Maywood, Illinois 60153

TELEPHONE: (312) 345-9780

You should bring such personnel to the conference who are familiar with your process wastewater treatment lagoon and who will enable complete discussion of the following issues; 1) validity of the aforesaid apparent violations; 2) short-term program to reduce or eliminate violations; and, 3) long-term program to achieve compliance, if necessary.

JUN 181984

E.F.A. - D.L.P.C. STATE OF ILLINOIS

Hall Aluminum May 31, 1984 Page 3

It is further requested that you confirm your attendance at such conference, in writing, to the undersigned within ten (10) days of receipt of this letter.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty (30) days of this notice date in an effort to resolve such conflicts which could lead to the filing of formal action.

If you have any questions, or if we may be of any assistance to you, please feel free to contact me.

Sincerely yours,

Major Hearn, Jr., Regional Coordinator

MH: gkw

Enclosure: DLPC Inspection Report

cc - DWPC-FOS-RU

- DLPC Division File

- DWPC, M. Drake

- DLPC, D. Gimbel

- Multi-Media File

RECEIVED

JUN 18 1984

E.P.A. — D.L.P.C. STATE OF ILLINOIS